



October 19, 2011

The Honorable Julius Genachowski  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: **In the Matter of Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High-Cost Universal Service Support, WC Docket No. 05-337; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; and Lifeline and Link-Up, WC Docket No. 03-109.**

Dear Chairman Genachowski:

You observed first-hand the importance of having broadband services available to consumers living and conducting business in rural areas when you visited Diller, Nebraska, on May 18, 2011. Our company does not serve Diller, but we serve many communities in Nebraska with similar demographics. In contrast to Diller, you also observed during your stop in Liberty, Nebraska, the detrimental impact on a community when a company chooses not to make the investments necessary to offer broadband services. As you and I spoke on May 18, I shared with you that our Company serves approximately 30,000 consumers spread over 14,000 square miles of rural Nebraska, and we invest in and operate a transport network of over 2,000 miles spanning the state.

The imminent action by the Federal Communications Commission ("FCC") on universal service fund ("USF") and intercarrier compensation ("ICC") reforms is of utmost importance to our customers and employees, and to hundreds of companies like ours. We continue to be greatly concerned about the impact the order will have on customers in rural Nebraska and the ability of rural companies to maintain or improve broadband services and keep quality jobs. As you know, we have worked closely with the FCC Commissioners and their staff and the FCC's Wireline Competition Bureau staff over several years to educate, inform and advocate on the universal service and ICC issues that are of immediate concern to Nebraskans. We would be disappointed if the FCC did not take steps to address our concerns but rather established rules that will harm our ability to continue to invest in rural Nebraska.



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For example, any action that may be taken that ignores or effectively ignores imposing any requirements on states to explicitly share in USF responsibility would be counter-productive. States such as Nebraska that have state universal funds will be disadvantaged because the citizens of other states will not be required to similarly contribute to the cost of universal service both in terms of voice and broadband network deployment. This could cause Nebraska policy makers to reduce or eliminate our state universal service fund and solely rely on federal USF. Such an outcome would have a devastating effect on rural Nebraska and place a greater burden on whatever new federal approach is adopted by the FCC.

Although the outcome of the USF portion of any FCC action is certainly important, our greatest immediate concern is with any effort to transition terminating ICC rates to zero (or near zero) and claim that this result can occur without preempting the states. Although under the plans that have been filed some USF recovery apparently is anticipated to be made available, giving the largest carriers “free use” (or effectively “free use”) of rural networks (without paying some compensation for the significant investment made to build and operate those networks) is a destructive policy. In fact, such a policy plays directly into the hands of the nation’s largest carriers whose apparent goal, we believe, is to use the networks built and operated by small companies like ours for free. The largest carriers who publicly proclaim their preference for little or no regulation are recommending that the FCC regulate and reduce the intrastate and interstate access rates for rural carriers to zero.

Additionally, this policy would be further destructive if budget constraints are imposed by the FCC that provide only limited dollars to replace these valuable ICC dollars that we use for the investment, deployment, operation and maintenance of the network that enables us to serve our customers. ICC revenues are material to us and comprise approximately 26% of our revenue. If inadequate replacement dollars for the lost ICC revenues were to be established by the FCC, that proposal would result in fewer dollars being available for broadband deployment in rural areas. At the same time, the ICC expense reduction to a “zero” or “near zero” rate will simply line the pockets of large companies that serve primarily if not exclusively urban areas. Separate and apart from the economic consequences of this policy, adopting “bill and keep” and the free use of rural networks for terminating services will likely result in protracted litigation, more uncertainty, and thus less investment.

We are also concerned that the FCC will not specifically address originating access in this order. If it does not, the future of originating access services in rural areas will be left to the dominant large carriers that control what remains of the long-distance business in those markets. As a result, long-distance rates for customers will rise dramatically and in some cases the wholesale rates charged by the large carriers may make it uneconomic for rural carriers to even provide these services at all.

We have provided detailed analysis to the FCC on the above issues and have made filings containing suggestions for the appropriate resolution of these issues. On behalf of rural Nebraskans and the companies that serve them, we would appreciate your consideration of these concerns and your modification of the proposed order to address them.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd A. Foje". The signature is stylized with a large, looped "T" and "F".

Todd A. Foje  
Chief Executive Officer  
Great Plains Communications, Inc.

Cc: The Honorable FCC Commissioner Mignon Clyburn  
The Honorable FCC Commissioner Michael J. Copps  
The Honorable FCC Commissioner Robert M. McDowell  
Senator Mike Johanns  
Senator Ben Nelson  
Congressman Jeff Fortenberry  
Congressman Adrian Smith  
Congressman Lee Terry  
Governor Dave Heineman, State of Nebraska  
Chairman Tim Schram, Nebraska Public Service Commission  
Commissioner Anne Boyle, Nebraska Public Service Commission  
Commissioner Rod Johnson, Nebraska Public Service Commission  
Commissioner Frank Landis, Nebraska Public Service Commission  
Commissioner Gerald Vap, Nebraska Public Service Commission